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September 11, 2001

**Sent via Hand Delivery**

Ms. Dawn Tesorero  
Technical Enforcement Program  
U.S. Environmental Protection Agency  
999 18th Street, Suite 300  
Denver, CO 80202-2466

Re: First Request for Information Pursuant to § 104 of CERCLA for the Vasquez Boulevard/I-70 Site, Denver, Colorado

Dear Ms. Tesorero:

On behalf of Pepsi Bottling Group, the attached information is intended to supplement my client's earlier responses to the above-referenced request for information. Specifically, responsive to questions 6, 9g And 9h of the information request I have attached the following:

1. A map of the PBG facility with seven areas identified.
2. A current schedule and description of construction work keyed to the seven areas identified on the map. This work is being done in connection with planned facility improvements. This work is to be performed between August 2001 and January 2002.
3. Soil sampling results associated with Area 1 and Area 2. As is noted in the sampling results no abnormal results were detected.

My client and its contractors are working closely to assure that a safe environment is maintained during the construction period. As additional sampling is conducted and results are obtained, we will forward the same to you.

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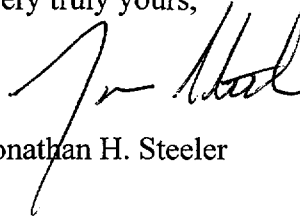
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Ms. Dawn Tesorero  
U.S. Environmental Protection Agency  
September 11, 2001  
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If you have any questions regarding this letter, the projects described herein or need further information (including further certification), please advise the undersigned.

Very truly yours,

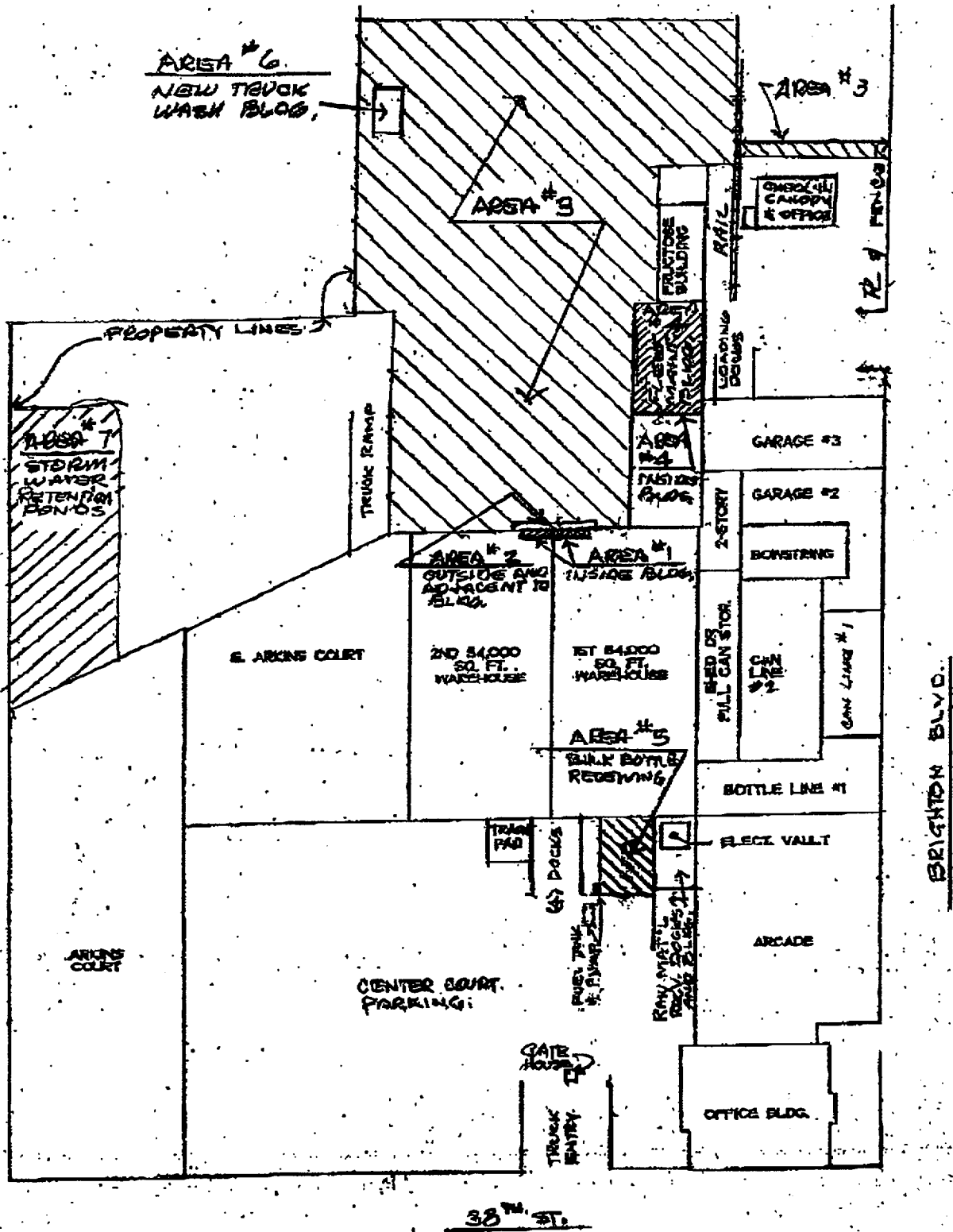


Jonathan H. Steeler

JHS:dmg  
Enclosure

cc: David H. Patrick, Esq. (w/encl)

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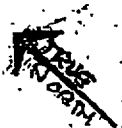
Structural Consultants Incorporated

2400 E. BAYVIEW AVE.  
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PEPSI BUILDINGS

NO SCALE

PLAN NORTH



SCHEDULE OF DIRT EXCAVATION AND/OR SITE  
GRADING FOR THE PEPSI PLASTIC BOTTLE LINE PROJECT

AREA	PROJECT NAME	DESCRIPTION OF WORK	8-9-01 SCHEDULED DATES
AREA #1	NORTH COURT LOADING DOCKS (PHASE I)	REMOVE EXISTING CONC. FLOOR AND EXCAVATE FOR NEW DOCK LEVELERS - INSIDE THE BLDG.	8-20-01 THRU 9-7-01
AREA #2	NORTH COURT LOADING DOCKS (PHASE I)	EXCAVATE FOR FOOTINGS AND GRADE BEAMS AND DRILL CAISSONS - ADJACENT TO BLDG. ON THE EXTERIOR HAUL OFF ALL EXCESS MAT'L.	9-10-01 THRU 9-28-01
AREA #3	NORTH COURT LOADING DOCKS AND RELATED PAVING.	REMOVE AND HAUL OFF UP TO 18 INCHES OF EXISTING MATERIAL AND REPLACE IT WITH 12 INCHES OF ROAD BASE AND 6 INCHES OF ASPHALT PAVING AND SOME CONCRETE PADS. THERE WILL BE EXCAVATION FOR UTILITY TRENCHES ALSO. & HAUL OFF ALL EXCESS MAT'L.	10-22-01 THRU 11-9-01
AREA #4	FLEET MAINTENANCE BLDG.	REMOVE EXISTING CONC. SLABS; EXCAVATE FOR NEW CONCRETE SLABS, CAISSONS & FOOTINGS; EXCAVATE AND HAUL OFF OLD CONC. AND ASPHALT; EXCAVATE FOR NEW UTILITY LINES; HAUL OFF ALL EXCESS MATERIAL INSIDE BLDG. AND ADJACENT TO BLDG.	10-22-01 THRU 11-20-01
AREA #5	BULK BOTTLE RECEIVING BLDG.	REMOVE EXIST. CONC. SLABS AND ASPHALT AND HAUL OFF SITE; EXCAVATE FOR CAISSONS, FOOTINGS, CAISSONS, CONC. SLABS AND ASPHALT; HAUL OFF EXCESS MAT'L.	11-19-01 THRU 1-20-02
AREA #6	NEW TRUCK WASH BLDG.	EXCAVATE FOR CAISSONS, FOUNDATIONS, CONCRETE SLABS AND ASPHALT; HAUL ALL EXCESS MAT'L. OFF SITE	11-19-01 THRU 1-20-02
AREA #7	STORM WATER POND FOR WATER QUALITY RETENTION	EXCAVATE FOR STORM SEWER LINES AND FOR WATER RETENTION POND	10-22-01 THRU 11-20-01

# **PROJECT REPORT**

## ***Area 1*** **Soil Testing for Lead & Arsenic**

### ***Project Location:***

**Pepsi Bottling Group  
3801 Brighton Blvd.  
Denver, CO 80216**

### ***Prepared by:***

**Gary E. Johnson  
Transportation & Industrial  
Services, Inc.  
3772 Puritan Way, Unit #4  
Erie, CO 80516**

### ***Report Date:***

**September 7, 2001**

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## **1.0 Project Background**

In order to obtain information on possible lead and arsenic in soils at the Pepsi Bottling Group facility located at 3801 Brighton Blvd., Denver, Colorado 80216, soil samples were collected from Area 1 prior to construction activities that would involve disturbing the soil below a section of the concrete floor that is to be removed. Area 1 of the Plastic Bottle Line Project is the portion just inside the north wall of the warehouse that will be removed to allow for construction of the new North Court Loading Docks.

The sampling project was conducted by Gary E. Johnson of Transportation & Industrial Services, Inc., 3772 Puritan Way, Unit # 4, Erie, Colorado 80516 on August 20, 2001.

## **2.0 Sampling Locations**

The portion of Area 1 in which construction will disturb the soil is 9.5 feet by 74 feet, adjacent to the north outside wall. One composite soil sample from each of 3 soil borings were collected from within these dimensions. The boring locations were selected randomly using a random number generator to select x and y coordinates of three equal sized sections of Area 1. Holes were saw cut through the 8" thick concrete slab to allow access to the soils below. Refer to the Sample Location Diagram attached to this report for a representation of the sample locations in Area 1.

## **3.0 Sampling Procedure**

The soil samples were collected using a stainless steel hand auger with a 1.5 inch diameter sample retrieval device. The hand auger was advanced through the soil at each boring location to a depth of 32" below the soil surface. The auger soil cuttings from 0" to 32" were placed in a stainless steel bowl and thoroughly mixed with a stainless steel spoon. Three sterile 4-ounce sample jars were filled with soil from the bowl for each sample, and the remaining soil was placed back into the boring. This procedure was repeated for each boring, thus yielding 3 composite soil samples for analysis. The samples were designated A1-1, A1-2, and A1-3.

The hand auger, bowl, and spoon were decontaminated after each boring to prevent cross contamination between samples. These items were scrubbed in an Alconox™ detergent and distilled water solution and then triple-rinsed with distilled water and dried with clean paper towels.

A chain-of-custody was completed and the sample jars were labeled, sealed, and placed in a cooler on ice for transportation to the laboratory. The samples were analyzed by Evergreen Analytical, Inc. located at 4036 Youngfield St. in Wheat Ridge, Colorado 80033. Each composite sample was submitted for Total Lead and Total Arsenic analysis by EPA Method SW6020A. The chain-of-custody and the laboratory reports are included as an attachment to this report.

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#### 4.0 Description of Soil Samples

Below are physical descriptions of the soil samples collected from the Area 1.

*Table 1.  
Soil Description of Samples Collected on 08/20/01*

Sample ID	Soil Description
A1-1	Light brown loamy sand, well sorted
A1-2	Light brown sand, poorly sorted with gravel and pebbles to ¾" diameter
A1-3	Light brown sand, poorly sorted with gravel and pebbles to ¾" diameter

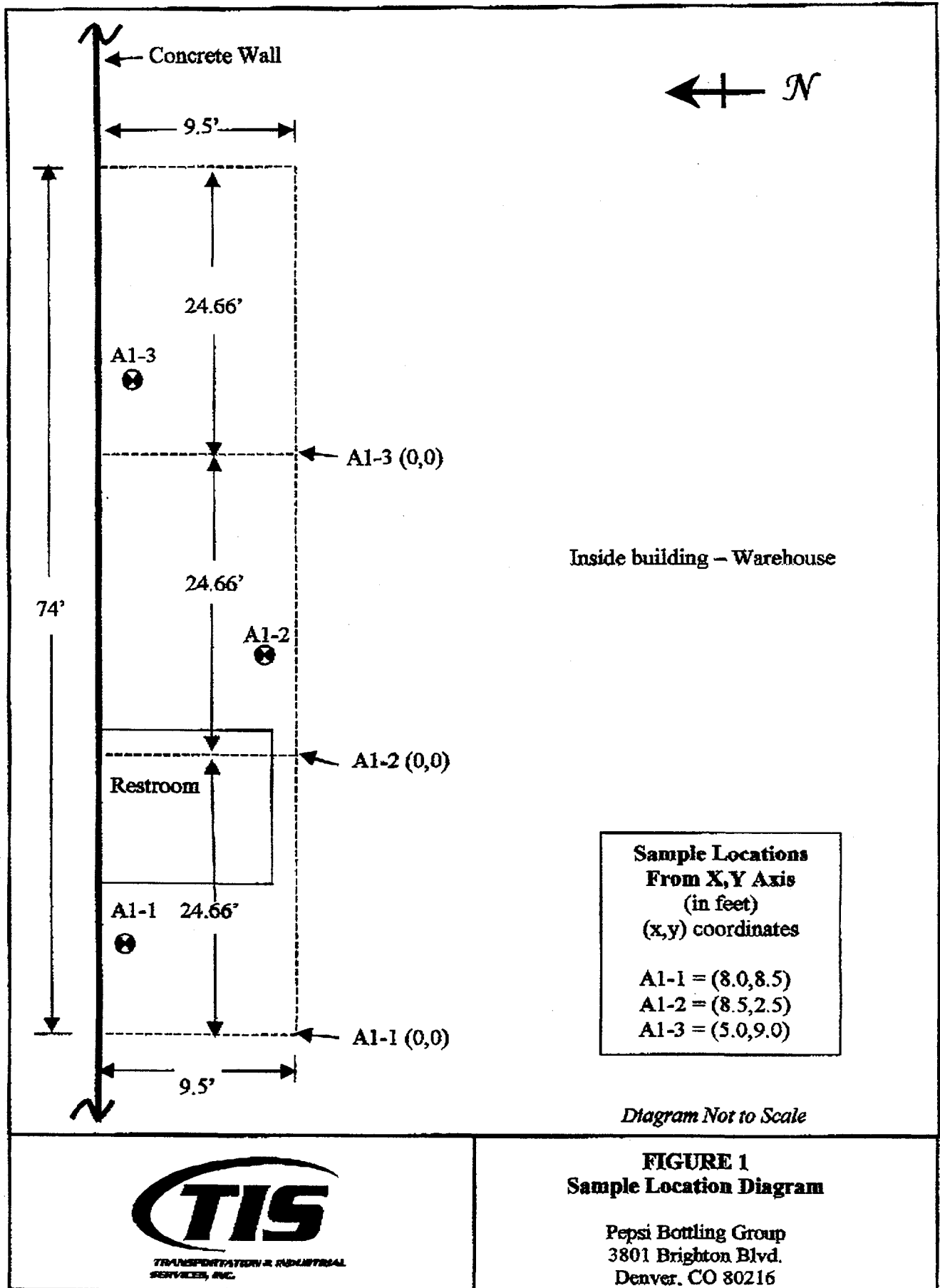
#### 5.0 Analytical Results

Below is a table listing the analytical results of the samples collected from Area 1.

*Table 2.  
Pb and As Analytical Results of Samples Collected on 08/20/01*

Sample ID	Time Collected	Total Arsenic Results (in mg/Kg)	Total Lead Results (in mg/Kg)
A1-1	0910 hrs.	3.5	8.9
A1-2	0940 hrs.	2.9	23
A1-3	1005 hrs.	4.3	51





# **PROJECT REPORT**

## ***Area 2*** **Soil Testing for Lead & Arsenic**

### ***Project Location:***

**Pepsi Bottling Group  
3801 Brighton Blvd.  
Denver, CO 80216**

### ***Prepared by:***

**Gary E. Johnson  
Transportation & Industrial  
Services, Inc.  
3772 Puritan Way, Unit #4  
Erie, CO 80516**

### ***Report Date:***

**September 8, 2001**

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- Area 2 & Caissons Soil Samples Laboratory Reports
- Crane Pad Soil Samples Chain-of-Custody
- Crane Pad Soil Samples Laboratory Reports
- TCLP Laboratory Reports
- Project Photographs

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Area 2 Project Report  
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## **1.0 Project Background**

In order to obtain information on possible lead and arsenic in soils at the Pepsi Bottling Group facility located at 3801 Brighton Blvd., Denver, Colorado 80216, soil samples were collected from Area 2 of the Plastic Bottle Line Project prior to construction activities that would involve disturbing the soil. Area 2 is located outside adjacent to the north wall of the warehouse walls that will be removed to allow for construction of the new North Court Loading Docks.

Subsurface soil samples were also collected at the locations designated for two caissons, which are scheduled to be drilled in Area 2 adjacent to the existing warehouse wall outside. In addition, samples were also collected adjacent to the north boundary of Area 2 for a temporary crane pad, which will be constructed by moving soils to level the surface.

The sampling project was conducted by Gary E. Johnson of Transportation & Industrial Services, Inc., 3772 Puritan Way, Unit # 4, Erie, Colorado 80516. The crane pad samples were collected on August 20, 2001 and the Area 2 samples on August 23, 2001.

## **2.0 Sampling Locations**

The portion of Area 2 in which construction will disturb the soil is 25 feet by 135 feet, adjacent to the north outside wall. The boring locations were selected randomly using a random number generator to select x and y coordinates of 6 equal sized sections of Area 2. One composite soil sample from each of 6 soil borings were collected from within these dimensions from a depth of 0'-7' feet below ground surface (bgs). The positions of the caisson sample locations were pointed out by Mr. Don Patton of PBG.

Two samples were collected from the crane pad, which is 40' by 80'. The sample locations from the crane pad were selected from 2 equal sized sections by the random number generator to select the x,y coordinates. Refer to the Sample Location Diagram attached to this report for a representation of the sample locations in Area 2 including the caissons and the crane pad.

## **3.0 Sampling Procedure**

The soil samples were collected using Geoprobe hydraulic push drilling rig. Stainless steel drive tubes were advanced through the soil at each boring location to the desired depth. New clear plastic sampling sleeves were used to retrieve the samples from each boring. The soil removed from the plastic sleeves samples was placed in a stainless steel bowl and thoroughly mixed with a stainless steel spoon. Three sterile 4-ounce sample jars were filled with soil from the bowl for each sample, and the remaining soil was placed back into the boring. This procedure was repeated for each boring, thus yielding 6 composite soil samples for analysis from Area 2 representing the depth from 0' to 7' bgs. The samples were designated A2-1, A2-2, A2-3, A2-4, A2-5, and A2-6.

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The caisson samples were also collected using the hydraulic push rig. Two composite samples were collected from each boring. Our intention was to push to a depth of 20' below bgs on both caisson locations. While advancing to depth in the Caisson 1 location we were met with auger refusal at 16', probably due to the gravel and small rocks encountered at depth. Caisson 2 boring was advanced to 20', but with some difficulty.

The samples from Area 2 Caisson 1 were collected to represent 0' to 10', and 10' to 16' bgs respectively. These samples were designated A2 Caisson 1-10 and A2 Caisson 1-16. The samples from Area 2 Caisson 2 were designated A2 Caisson 2-10 and A2 Caisson 2-20. The base of fill appeared to be approximately 12 feet bgs in both borings.

The crane pad soil samples, designated as Crane Pad 1 and Crane Pad 2 were collected from 0' to 2' bgs with a stainless steel hand auger.

The stainless steel drive tubes (and hand auger), bowl, and spoon were decontaminated after each boring to prevent cross contamination between samples. These items were scrubbed in an Alconox™ detergent and distilled water solution and then triple-rinsed with distilled water and dried with clean paper towels.

A chain-of-custody was completed and the sample jars were labeled, sealed, and placed in a cooler on ice for transportation to the laboratory. The samples were analyzed by Evergreen Analytical, Inc. located at 4036 Youngfield St. in Wheat Ridge, Colorado 80033. Each composite sample was submitted for Total Lead and Total Arsenic analysis by EPA Method SW6020A. The chain-of-custody and the laboratory reports are included as an attachment to this report.

#### 4.0 Description of Soil Samples

Below are physical descriptions of the soil samples collected from the Area 2.

**Table 1.**  
**Soil Description of Samples -Area 2**

Sample ID	Soil Description
A2-1	Brown silty sand, poorly sorted with gravel and pebbles to 1" diameter and small pieces of red brick
A2-2	Brown silty sand, poorly sorted with gravel and pebbles to 1" diameter
A2-3	Brown silty sand, poorly sorted with gravel and pebbles to 1" diameter and small pieces of red brick
A2-4	Brown silty sand, poorly sorted with gravel and pebbles to 1" diameter and small pieces of red brick to 1"
A2-5	Brown silty sand, poorly sorted with gravel and pebbles to 1" diameter
A2-6	Brown silty sand, poorly sorted with gravel and pebbles to 1" diameter

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**Table 2.**  
**Soil Description of Samples –Caisson 1 & 2**

Sample ID	Soil Description
A2 Caisson 1-10	Brown silty sand, poorly sorted with gravel and pebbles to 1" diameter and small pieces of red brick to 1"
A2 Caisson 1-16	Tan well graded silty sand with gravelly clay
A2 Caisson 2-10	Brown silty sand, poorly sorted with gravel and pebbles to 1" diameter and small pieces of red brick to 1"
A2 Caisson 2-20	Tan well graded silty sand with gravelly clay

**Table 3.**  
**Soil Description of Samples –Crane Pad**

Sample ID	Soil Description
Crane Pad 1	Brown silty sand, poorly sorted with gravel and pebbles to 1" diameter and small pieces of red brick to 1"
Crane Pad 2	Brown silty sand, poorly sorted with gravel and pebbles to 1" diameter and small pieces of red brick to 1"

## 5.0 Analytical Results

Below is a table listing the analytical results of the samples collected from Area 1.

**Table 4.**  
**Pb and As Analytical Results -Area 2**

Sample ID	Time Collected	Depth Collected bgs	Total Arsenic Results (in mg/Kg)	Total Lead Results (in mg/Kg)
A2-1	1028 hrs.	0'-7'	35	300
A2-2	1055 hrs.	0'-7'	11	120
A2-3	1125 hrs.	0'-7'	24	200
A2-4	1210 hrs.	0'-7'	21	190
A2-5	1230 hrs.	0'-7'	13	180
A2-6	1150 hrs.	0'-7'	8.8	81

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**Table 5.**  
***Pb and As Analytical Results of Caisson Samples***

Sample ID	Time Collected	Depth Collected bgs	Total Arsenic Results (in mg/Kg)	Total Lead Results (in mg/Kg)
A2 Caisson 1-10	0840 hrs.	0'-10'	15	120
A2 Caisson 1-16	0852 hrs.	10'-16'	15	240
A2 Caisson 2-10	0935 hrs.	0'-10'	18	210
A2 Caisson 2-20	0945 hrs.	10'-20'	9.2	58

**Table 6.**  
***Pb and As Analytical Results of Crane Pad Samples***

Sample ID	Time Collected	Depth Collected bgs	Total Arsenic Results (in mg/Kg)	Total Lead Results (in mg/Kg)
Crane Pad 1	1120 hrs.	0'-2'	13	110
Crane Pad 2	1200 hrs.	0'-2'	22	320

## 6.0 TCLP Analytical Results

The 5 soil samples from Area 2 and the Crane Pad with the highest lead results were selected for additional analysis by Toxicity Characteristic Leaching Procedure (TCLP). Evergreen Laboratory performed the tests request and below are the analytical results.

**Table 7.**  
***TCLP Pb and As Analytical Results***

Sample ID	Time Collected	Depth Collected bgs	Total Lead Results (in mg/Kg)	TCLP Lead Results (in mg/L)
Crane Pad 2	1200 hrs.	0'-2'	320	U
A2 Caisson 1-16	0852 hrs.	10'-16'	240	U
A2 Caisson 2-10	0935 hrs.	0'-10'	210	U
A2-1	1028 hrs.	0'-7'	300	0.52
A2-3	1125 hrs.	0'-7'	200	0.74

Note: U = not detected at the reporting limit

The chain-of-custody and the laboratory report for the TCLP analyses are included as an attachment to this report.

